

Christopher D. Moon, SBN 246622
chris@moonlawapc.com
Kevin O. Moon, SBN 246792
kevin@moonlawapc.com
MOON LAW APC
228 Hamilton Ave., 3rd Fl
Palo Alto, California 94301
Telephone: (619) 915-9432
Facsimile: (650) 618-0478

Attorneys for Movants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
PG&E Corporation,
and
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**REPLY IN SUPPORT OF MOTION
PURSUANT TO FED. R. BANKR. PROC.
7015 AND 7017 TO ENLARGE TIME TO
FILE PROOF OF CLAIM PURSUANT TO
FED. R. BANKR. PROC. 9006(b)(1)**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case, No.
19-30088-DM

Date: November 30, 2022
Time: 10 a.m. (Pacific Time)
Place: **Telephonic/Video Appearances Only**
United States Bankruptcy Court
Courtroom 17,
450 Golden Gate Ave., 16th Floor
San Francisco, CA
Judge: Hon. Dennis Montali

Objection deadline: November 23, 2022

1 **I. RELEVANT PROCEDURAL HISTORY**

2 On October 17, 2022, Rick Hallen, Kyla Wright, Dillon Harris, Austin Wright, Josie
3 Wright, Ann Wright, Blake Barnes, and Yvonne Phillips (“Movants”) filed a motion seeking an
4 order expanding the time to file their proofs of claim. *See* Dkt. Nos. 13088-90.

5 On October 31, 2022, Fire Victim Trustee (“FVT”) filed an Objection to Movants’
6 Motion. *See* Dkt. No. 13139.

7 **II. ARGUMENT**

8 In its Objection to Movants’ Motion, FVT mischaracterizes certain facts, which Movants
9 seek to correct. Specifically, FVT makes the following representations:

10 The Motion states that Movants made conscious decisions not to file proofs of claim
11 before the Extended Bar Date and only chose to consult counsel after learning that they
12 could obtain compensation for their emotional distress claims. The Motion does not claim
13 that Movants did not have notice of the Extended Bar Date or were unable to file a claim
14 due to circumstances beyond their control. Rather, it acknowledges that Movants chose
15 not to file timely proofs of claim but has submitted the proofs of claim at issue based on
16 counsel’s confirmation that they could receive compensation for emotional distress and
17 other claims.

18 Dkt. No. 13139 at 5. To be clear, Movants did **not** make the “conscious decision[] not to file
19 proofs of claim before the Extended Bar Date,” nor did Movants’ Motion represent this either
20 explicitly or implicitly. *See* Supp. Moon Decl., ¶ 3. That is because Movants **did not know** of the
21 Bar Date or the Extended Bar Date before they lapsed. *Id.* Therefore, FVT’s representation that
22 “Movants chose not to file timely proofs of claim” is wholly inaccurate. Rather, Movants learned
23 for the first time in October 2022 that there was a Bar Date of any kind. *Id.* In addition, and as
24 explained in more detail in their Motion, Movants learned for the first time in October 2022 that
25 they were entitled to pursue claims against PG&E for their losses and emotional distress caused
26 by the Camp Fire. *See* Dkt. No. 13088. Once in receipt of this critical information, Movants
27 immediately contacted the undersigned and filed a proof of claim. *See* Supp. Moon Decl., ¶ 3.

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2 **III. CONCLUSION**

3 For the reasons set forth herein as well as in their moving papers, Movants respectfully
4 request that this Court GRANT their Motion.

5 Dated: November 14, 2022

MOON LAW APC

6 By:

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9 _____
10 CHRISTOPHER D. MOON
11 KEVIN O. MOON
12 *Attorneys for Movants*
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4 *kevin@moonlawapc.com*
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7 Palo Alto, California 94301
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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**
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15 In re
16 PG&E Corporation,
17 and
18 PACIFIC GAS AND ELECTRIC
19 COMPANY,
20 Debtors.

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**SUPPLEMENTAL DECLARATION OF
CHRISTOPHER D. MOON IN SUPPORT
OF MOTION PURSUANT TO FED. R.
BANKR. PROC. 7015 AND 7017 TO
ENLARGE TIME TO FILE PROOF OF
CLAIM PURSUANT TO FED. R. BANKR.
PROC. 9006(b)(1)**

21 ☐ Affects PG&E Corporation
22 ☐ Affects Pacific Gas and Electric Company
23 ☒ Affects both Debtors
24
25 *All papers shall be filed in the Lead Case, No.
26 19-30088-DM

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San Francisco, CA
Judge: Hon. Dennis Montali
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1 I, Christopher D. Moon, hereby declare:

- 2
- 3 1. I am an attorney at law duly licensed to practice before all state and federal courts of the
- 4 State of California. I am a managing partner with the law firm Moon Law APC, based in
- 5 Palo Alto, California.
- 6 2. My law firm represents wildfire victims who sustained losses from the Camp Fire in
- 7 2018. My firm has timely filed dozens of Proof of Claim forms with Prime Clerk for
- 8 losses clients have suffered as a result of the fire.
- 9 3. Claimants Rick Hallen, Kyla Wright, Dillon Harris, Austin Wright, Josie Wright, Ann
- 10 Wright, Blake Barnes, and Yvonne Phillips ("Movants") informed me in October 2022
- 11 that they did not know of the Bar Date or the Extended Bar Date. Rather, Movants
- 12 learned for the first time in October 2022 that there was a Bar Date of any kind. In
- 13 addition, Movants learned for the first time in October 2022 that they were entitled to
- 14 pursue claims against PG&E for their losses and emotional distress caused by the Camp
- 15 Fire. Once in receipt of this information, Movants immediately contacted me.
- 16 4. I am over eighteen years of age, of sound mind, and fully competent to make this
- 17 declaration. All statements in this declaration are based on my own personal knowledge
- 18 and observation and from my review of the court and business records in this case, or
- 19 upon information and belief as indicated. If called to testify on this matter, I can and
- 20 would competently testify to the matters set forth in this Declaration.
- 21 5. I declare under penalty of perjury pursuant to the laws of the United States of America
- 22 that the foregoing is true and correct.

23 Executed this 14th day of November, 2022, in Palo Alto, California.

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27 CHRISTOPHER D. MOON

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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access the filing through the Court's filing system.

Executed on November 14, 2022, at Palo Alto, California.

/s/ Christopher D. Moon
Christopher D. Moon